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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of )

Advanced Television Systems )  
and Their Impact upon the )  
Existing Television Broadcast )  
Service )

) MM Docket No. 87-268

To: The Commission

**RURAL CALIFORNIA BROADCASTING CORPORATION'S  
PETITION FOR RECONSIDERATION OF**

**THE  
SIXTH REPORT AND ORDER**

In response to the Commission's issuance of its Sixth Report and Order released April 21, 1997, Rural California Broadcasting Corporation ("Rural") licensee of noncommercial educational television station KRCB submits this Petition for Reconsideration.

Rural wishes to thank Commission for releasing the Fifth and Sixth Reports and Orders. Rural appreciates the enormous amount of work that the Commission has undertaken in meeting a multitude of challenges in preparing the nation for the transition to digital television. Furthermore Rural believes that the orders in the main represent a fair and balanced approach to DTV implementation which will serve the needs of both the public and the broadcasters. Rural also appreciates the Commission's recognition of the unique difficulties Public Television Stations face as they convert to DTV.

**Petition for Reconsideration**

Rural operates KRCB, a small non-commercial station located in northern California adjacent to the San Francisco market. The closest non commercial station to the north is 250 miles away. The station serves the communities of the north bay region, many of which are located in rural areas. KRCB currently operates at 67.6 kw erp which is significantly lower than the maximum permissible for this channel. KRCB's DTV channel assignment, ch 23, is separated by a distance of 66.7 km to adjacent DTV channel 24 which is assigned to a station in San Francisco. This San Francisco Station is planning to operate on Sutro Tower. This short spacing situation, was first identified in Rural's Comments On The

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Sixth Notice Of Proposed Rulemaking, filed November 21, 1997.

In addition to this short spacing issue, Rural is concerned that the deletion of a vacant noncommercial allotment may compromise future universal access to public television service in currently unserved areas of northern California.

The vacant noncommercial NTSC allotment channel 62 for Santa Rosa California has been deleted in the Sixth Report and Order and no noncommercial DTV allotment has been assigned to the area that would have been served by such a station. As KRCB is the only noncommercial station located in the region and able to extend noncommercial DTV service into this region, Rural believes it may need to increase its DTV power in the future to provide service to these areas. Rural recognizes that a major limiting factor in its ability to increase its power is protecting adjacent DTV channels from interference. However, since KRCB's DTV channel is "short spaced" to an adjacent DTV channel it's ability to increase power may be unduly limited, and therefore noncommercial universal service to the area jeopardized. (Rural appreciates that the Commission has stated that after the transition it will consider establishing additional noncommercial reserved allotments on recovered spectrum, but none the less felt it was important to point out this situation.)

Rural is actively studying solutions to this problem, and awaiting actions by the Broadcasters Caucus and the release of OET Bulletin 69 which may impact the situation. Rural supports the proposals of the Broadcasters Caucus for industry wide coordination process for negotiating modifications to the table of allotments within it's region.

At this time Rural does not have a solution to offer, but wishes to go on record as having identified this situation. Rural commits to filing a supplement to this filing if, in the course of fact finding or negotiations, a solution is identified.

Rural hereby petitions the Commission for reconsideration of the following matters:

1-in light of the deletion of the vacant non-commercial allotment in Santa Rosa, KRCB may need to increase it's DTV power at some future date to serve areas that would have been served by a non-commercial station filling that allotment.

2-the deletion of the vacant non-commercial allotment means that a sizeable portion of northern California may be without noncommercial DTV service.

3-provide broadcasters with 90 days after the release of OET  
Bulletin 69 to negotiate regional modifications to the table  
of allotments.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Nancy Dobbs", is written over a horizontal line.

Nancy Dobbs  
President and Chief Executive Officer  
Rural California Broadcasting Corporation  
5850 Labath Avenue  
Rohnert Park, California 94928  
(707)585-8522

Date: June 12, 1997